IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

BLANCA "LORENA" P. CEDILLOS-GUEVARA, *et al.*,	:	
Plaintiffs,	:	
v.	:	Civil Action No. GLR-14-0196
MAYFLOWER TEXTILE SERVICES CO., *et al.*,	:	
Defendants.	:	

PLAINTIFFS' MOTION FOR ORDER TO SHOW CAUSE WHY JOHN WILLIAMS, EAST TO WEST ENTERPRISES, INC., AND NORTH EAST EMPLOYMENT, INC. SHOULD NOT BE HELD IN CONTEMPT OF COURT

Plaintiffs, through undersigned counsel, and pursuant to Fed. R. Civ. P. 45(g), hereby move this Court for an Order to Show Cause why John Williams ("Williams), East to West Enterprises, Inc. ("East to West"), and North East Employment, Inc. ("North East") should not be held in contempt of this Court for failing, without adequate excuse, to respond to duly-served subpoenas.

In support of this motion, Plaintiffs state:

1. Plaintiffs' complaint in the above-captioned matter, filed January 25, 2014, named East to West, *inter alia*, as a defendant. On April 16, 2014, the clerk entered a default against East to West. ECF No. 11.

2. On April 23, 2015, Plaintiffs filed a motion to amend their complaint to add six new defendants who paid employees at the Mayflower laundry facility, including Williams and North East. ECF No. 86. This motion is pending.

3. Plaintiffs attempted to serve subpoenas on Williams and East to West during the early part of 2015, but were unsuccessful because Williams and East to West evaded service. *See* ECF No. 88 at 4; ECF Nos. 88-2, 88-3.

4. On March 23, 2015, at 2:30 p.m. Plaintiffs successfully served subpoenas to produce documents on Williams, East to West, and North East at 3224 Doycron Court, Baltimore, Maryland. Bobby Williams, who, on information and belief is an adult son of John Williams, accepted service on behalf of Williams, East to West, and North East. *See* Exs. 1-3.

5. All of these subpoenas requested, *inter alia*, "[a]ny and all documents or electronically stored information that contains, reflects, or relates to the names and/or addresses, telephone numbers, electronic mail addresses, or any other contact information of any and all people who worked or may have worked at the Mayflower Textile Services laundry facility located at 2601 W. Lexington Street, Baltimore, MD 21202, at any time from January 1, 2012, to the present…"

6. All of these subpoenas stated that they were to be complied with by March 30, 2015, at 9:00 a.m.

7. Plaintiffs did not receive any documents, or any response whatsoever, from Williams, East to West, or North East prior to the March 30, 2015, deadline, or since that date.

8. Nearly two months have now elapsed since the March 30, 2015, deadline to comply with the subpoenas. Williams, East to West, and North East have not provided any responsive documents, nor have they given any excuse for their complete failure to comply with the subpoenas, or otherwise communicated with undersigned counsel.

WHEREFORE, pursuant to Fed. R. Civ. P. 45(g), which authorizes this Court to "hold in contempt a person who, having been served, fails without adequate excuse to obey [a] subpoena," Plaintiffs request this Court to issue an Order to Show Cause why John Williams, East to West Enterprises, Inc., and North East Employment, Inc. should not be held in contempt of court within ten (10) days of the Court's order.

A proposed Order to Show Cause is attached.

Date: May 22, 2015

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May, 2015, a copy of the foregoing Plaintiffs' Motion for Order to Show Cause Why John Williams, East to West Enterprises, Inc., and North East Employment, Inc. Should Not Be Held in Contempt of Court, along with all attachments, was served on all parties via the Court's ECF system and via first-class mail to:

John Williams
East to West Enterprises, Inc., c/o John Williams
North East Employment, Inc., c/o John Williams
3224 Doycron Court
Baltimore, MD 21207

/s/
Daniel A. Katz